



# INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Intermediate Operating Permit Number:**

**Expiration Date:**

**Installation ID:** 105-0013

**Project Number:** 2002-11-017

**Installation Name and Address**

Detroit Tool & Engineering  
1107 Springfield Road  
Lebanon, MO 65536  
Laclede County

**Parent Company's Name and Address**

Assembly & Test Worldwide  
313 Mound Street  
Dayton, OH 45402-8370

**Installation Description:**

Detroit Tool & Engineering manufactures custom-built machine parts. Process operations include a spray paint booth, propane-fired steam cleaner, propane-fired space heaters, sand blasting and fugitive welding emissions. The installation has accepted voluntary, federally enforceable emission limitations to qualify for this Intermediate State Operating Permit.

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Effective Date

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Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Detroit Tool & Engineering manufactures custom-built machine parts. Process operations include a spray paint booth, propane-fired steam cleaner, propane-fired space heaters, sand blasting and fugitive welding emissions. The installation has accepted voluntary, federally enforceable emission limitations to qualify for this Intermediate State Operating Permit.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.07	--	--	1.62	--	--	--
2004	0.01	--	--	0.84	--	--	--
2003	0.01	--	0.18	1.86	0.02	--	--
2002	0.02	--	0.21	2.62	0.03	--	--
2001	--	--	1.00	3.00	--	--	--

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation, which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Spray Paint Booth

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

#### Description of Emission Source

Propane-fired steam cleaner  
Space heaters, propane-fired  
Touch-up spray painting with aerosol spray paint cans  
Welding emissions, fugitive  
Sand blasting, fugitive

### DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Air Construction Permit #0798-017

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

#### **Emission Limitation:**

- 1) The permittee shall emit less than 100 tons of volatile organic compounds (VOC) from this installation in any consecutive 12-month period.
- 2) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) HAP from this installation in any consecutive 12-month period.
- 3) The permittee shall emit less than 25 tons of combined hazardous air pollutants from this installation in any consecutive 12-month period.

#### **Monitoring:**

- 1) The permittee shall monitor the monthly amount of VOC containing materials used at the installation.
- 2) The permittee shall monitor the monthly amount and type of HAP containing materials used at the installation.

#### **Recordkeeping:**

- 1) The permittee shall record the monthly total of VOC emissions and the sum of the most recent consecutive 12-month totals in tons from this installation. (See Attachment A)
- 2) The permittee shall record the monthly total of individual and combined HAP emissions from this installation and the sum of the most recent consecutive 12-month totals in tons. (See Attachments B and C)
- 3) All records shall be kept on-site for a minimum of five years and made available to the Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the installation exceeded the limitations listed above.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – Spray Paint Booth			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0010	Surface coating of miscellaneous metal parts; MHDR 4.0 gal/hr; equipped with low temperature fabric filter with 95% PM capture efficiency and 90% PM control efficiency; installed in 1984	NA	EP-02

#### PERMIT CONDITION EU0010-001

10 CSR 10-6.400 Restriction of Emissions of Particulate Matter from Industrial Processes

##### Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 in excess of the 0.5 lb/hr.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

##### Monitoring:

- 1) Any booths equipped with mat/panel filters (CD-02) shall not be operated without a filter in place.
- 2) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

##### Recordkeeping:

- 1) The permittee shall maintain records of inspections of mat/panel filters when they occur.
  - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
  - b) Attachment D contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 2) All records shall be kept on-site for a minimum of five years and made available to the Missouri Department of Natural Resources' personnel upon request.

##### Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined that the emission unit exceeded the limitations listed above. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### 10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

#### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

#### **10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-3.030 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority, which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Detroit Tool & Engineering from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.



### **10 CSR 10-3.090 Restriction of Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**This requirement is not federally enforceable.**

### **10 CSR 10-6.100 Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

### **10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

#### **10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Jim Sheldon, President. On March 28, 2005, the Air Pollution Control Program was informed that Jim Sheldon, President is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. Attachments**

Attachments follow.

Draft



This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001-001.

[illegible]

- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];  
2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];  
3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
- (b) Summation of [Column 5], in tons;
- (c) 12-month VOC emissions total (e) from last month's worksheet, in tons;
- (d) Monthly VOC emissions total (b) from previous year's worksheet, in tons;
- (e) Calculate the new 12-month VOC emissions total. A 12-month VOC emissions total (e) of less than 100.0 tons indicates compliance.

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001.

[illegible]

- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];  
2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];  
3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
- (b) Summation of [Column 5], in tons;
- (c) 12-month HAP emissions total (e) from last month's worksheet, in tons;
- (d) Monthly HAP emissions total (b) from previous year's worksheet, in tons;
- (e) Calculate the new 12-month combined HAP emissions total. A 12-month HAP emissions total (e) of less than 25.0 tons indicates compliance.

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001.

[illegible]

- (a) Individually list each material which emits this specific HAP from the entire installation;
- (b) Record the amount of HAP emissions already calculated in [Column 5] of Attachment B in tons;
- (c) Summation of [Column 5], in tons;
- (d) Record the pervious 12-month individual HAP emissions total (f) from last month's worksheet, in tons;
- (e) Record the monthly HAP emissions total (c) from previous year's worksheet, in tons;

Calculate the new 12-month individual HAP emissions total. A 12-month individual HAP emissions total (f) of less than 10.0 tons indicates compliance.

This recordkeeping sheet or an equivalent form may be used to record inspections of equipment, maintenance, repairs and malfunctions.

[illegible]

# STATEMENT OF BASIS

## **Voluntary Limitations**

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

## **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received 11/01/02;
- 2) 2004 Emissions Inventory Questionnaire, received 3/28/05; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

## **Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

## **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

### **10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating***

In the operating permit application, the permittee indicated that the propane-fired space heaters and steam power cleaner were subject to this rule. It is highly unlikely that the minimal emissions from these propane-fired units would ever exceed the particulate matter emission limitation. Therefore, this rule has not been applied to these emission units.

### **10 CSR 10-6.100, *Alternate Emission Limits***

This rule is not applicable because the installation is not in an ozone nonattainment area.

### **10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds***

In the operating permit application, the permittee indicated that this rule was applicable plantwide. However, according to 10 CSR 10-6.260(1)(A)2, combustion equipment that uses exclusively pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels is exempt

from this rule. Because all combustion units at the installation are powered by liquid petroleum gas (propane), this rule has not been applied to this installation.

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

None.

### **New Source Performance Standards (NSPS) Applicability**

None.

### **Maximum Available Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart M, *Surface Coating of Miscellaneous Metal Parts and Products*

The permittee has the potential to exceed the major source threshold for HAP and be affected by Subpart M. However, the installation has voluntarily agreed to federally enforceable emission limits of less than 10 tons of any single HAP and/or 25 tons of combined HAP in any consecutive 12-month period. Operating under this condition will ensure that this installation is not a major source for HAP and is not subject to the MACT requirements for Subpart M.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*

10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption*

Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250

The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

### **Other Regulatory Determinations**

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

This rule applies to EU0010. The calculations below verify compliance provided the required control device is in operation and working properly:

#### Emission Rate Limit

Emission Rate Limit (lb/hr)  $E = 4.1(P)^{0.67}$

Where: P = process weight rate = (4 gal/hr) \* (8.65 lb/gal) \* (ton/2000 lb) = 0.0173 ton/hr  
Emission Rate Limit (lb/hr)  $E = 4.1(0.0173)^{0.67} = 0.27$  lb/hr. However, according to 10 CSR 10-6.400(1)(b)11, emission sources that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of PM are exempt, therefore the PM emission limit = 0.5 lb/hr

#### Controlled Emission Rate

Controlled Emission Rate (lb/hr) =  $(P)(\text{Emission Factor}) \left[ 1 - \frac{\text{Transfer rate}}{100} \right] \left[ 1 - \left( \frac{\text{Overall Control eff}}{100} \right) \right]$

Where: Emission Factor (lb/ton) = (% solids/100)\*2000(lb/ton)

Emission Unit #	MHDR (gal/hr)	Density (lb/gal)	Process Weight Rate (ton/hr)	Solids (%)	PM Emission Factor (lb /ton)	Transfer Rate (%)	Overall Control Eff. (%)	Controlled PM Emission Rate (lb/hr)	PM Emission Rate Limit (lb/hr)
EU0010	4.0	8.65	0.0173	29.10	582	75	85.5%	0.36	0.5

\* coating information from 2004 EIQ

#### PM Concentration Compliance

Emission rate (gr/dscf) = Emission Rate (lb/hr)\*7000 (grains/lb)/Stack flow rate (SCFM)/60(min/hr)

Flow rates converted from actual to standard conditions using the ideal gas law.

Emission Unit #	Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0010	0.36	80	10,412	10,181	0.004	0.3

#### **Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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Jason Dickneite  
Environmental Engineer





CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. John Schott, President  
Detroit Tool & Engineering  
1107 Springfield Road  
Lebanon, MO 65536

Re: Detroit Tool & Engineering, 105-0013  
Permit Number:

Dear Mr. Schott:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
Southwest Regional Office  
PAMS File: 2002-11-017

CERTIFIED MAIL 70041160000081717142  
RETURN RECEIPT REQUESTED

Mr. John Bradley  
Environmental Manager  
Detroit Tool & Engineering  
1107 Springfield Road  
Lebanon, MO 65536

Re: Draft Intermediate Operating Permit – Project (PAMS) No: 2002-11-017

Dear Mr. Bradley:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Intermediate (Title V) permit application. A public notice will be placed in The Lebanon Daily Record on Sunday, June 25, 2006.

The APCP will accept comments regarding the draft permit that are postmarked on or before the closing date. It is very important that you read and understand this legal document. You will be held responsible for complying with this document.

Please address comments or recommendations for changes to my attention at:

Operating Permits Unit  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102

A copy of this draft is also being sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the

Mr. John Bradley  
Page Two

region) may propose to issue. A public hearing may be held if interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Jason Dickneite  
Environmental Engineer

JD/kdm

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
Southwest Regional Office  
PAMS File: 2002-11-017

## No Affected States

RE: Affected States Review – Notification of Proposed Final Intermediate Operating Permit

Dear Mr. {Director's Name}:

In accordance with Missouri State Rule 10 CSR 10-6.065(5)(F)1. and the Clean Air Act this letter is to notify you of public notice of the preliminary draft and request for comments for:

Detroit Tool & Engineering located in Lebanon, MO 65536

Project Number – 2002-11-017

Public notice will be published in The Lebanon Daily Record in Lebanon, MO on Sunday, June 25, 2006.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing by no later than July 24, 2006 to my attention at Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Should you require further information or documentation on this matter, please contact the Operating Permits Unit at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:jdk

For Publication on Sunday, June 25, 2006

Notice of documents available for public viewing  
Department of Natural Resources  
Division of Environmental Quality  
Air Pollution Control Program

A draft-operating permit has been issued for the following air pollution sources:

Installation	City	Project #
Detroit Tool & Engineering	Lebanon	2002-11-017

Activities included in these permits are all activities involved in the operation of these sources with the potential for producing regulated quantities of regulated air pollutants.

Copies of the draft permits are available for public comment. Public files containing copies of all non-confidential materials and a copy or summary of other materials, if any, considered in this draft permit, are available for public viewing at the following locations: MO Dept. of Natural Resources, Southwest Regional Office, 20400 West Woodland, Springfield, MO 65807-5912 or by written request from the Air Pollution Control Program, Operating Permits Unit, P.O. Box 176, Jefferson City, MO 65102 (Information deemed confidential business information pursuant to Missouri State Rule 10 CSR 10-6.210, *Confidential Information*, if any exists, is not included in the public files. Emission data, as defined by this rule, cannot be considered confidential business information.)

The file is available for viewing through July 24, 2006. Citizens are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing no later than July 24, 2006. Written comments and/or requests for public hearing should be sent to Mr. Jim Kavanaugh, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

The Air Pollution Control Program will hold an informal public hearing after an additional 30 day comment period on the draft permit if: 1.) A timely request is made for such a hearing during the public comment period; and 2.) The person requesting the hearing identifies material issues concerning the preliminary determination and the Air Pollution Control Program determines that a public hearing will be useful in resolving those issues.

This public notice is made pursuant to Missouri State Rule 10 CSR 10-6.065, Operating Permits.

Lebanon Daily Record  
100 E. Commercial  
PO Box 192  
Lebanon, MO 65536

Attention: Legal Ads

To Whom It May Concern:

We wish to place the attached legal advertisement in your newspaper to be run ONCE. It must run on Sunday, June 25, 2006.

We require a certified affidavit of publication. This must be received in our office by July 7, 2006. Please submit the affidavit and invoice for payment to:

Attention: Cheri Bechtel  
Department of Natural Resources  
Air Pollution Control Program  
P. O. Box 176  
Jefferson City, MO 65102

If you have any questions, please contact me at (573) 751-4817. Thank you for your assistance.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permits Unit Chief

MJS/jdk

c: Cheri Bechtel, Procurement Clerk  
PAMS File: 2002-11-017

MISSOURI DEPARTMENT OF NATURAL RESOURCES FOLDER TRANSMITTAL ROUTING SHEET		Document #: Division Log #: Program Log #:
DEADLINE: Date		
Penalty for Missing Deadline: None		
Detroit Tool & Engineering2002-11-017		
Originator: Jason DickneiteTelephone: 573-751-4817Date:		
Typist: Karla MarshallFile Name: P:\APCP\Permits\Users\Jason Dickneite\Projects\Intermediates\Detroit Tool & Engineering\Detroit Tool & Engineering (2002-11-017 after IR and ER.doc		
FOR SIGNATURE APPROVAL OF:		
<input type="checkbox"/> DNR Director <input type="checkbox"/> DNR Deputy Director <input type="checkbox"/> Division Director <input type="checkbox"/> Division Deputy DirectorX Other: James L. Kavanaugh		
PROGRAM APPROVAL: Approved by: Program: APCPDate:		
Other Program Approval (Section/Unit): Date:		
Comments:		
ROUTE TO:		
<input type="checkbox"/> DIVISION DIRECTOR APPROVAL:Date:		
Comments:		
<input type="checkbox"/> FINANCIAL REVIEW – DIVISION OF ADMINISTRATIVE SUPPORT:		
DAS Director:Date:		
<input type="checkbox"/> Fee Worksheet Received By:Date:		
Accounting:Date:		
Budget:Date:		
General Services:Date:		
Internal Audit:Date:		
Purchasing:Date:		
Comments:		
<input type="checkbox"/> LEGAL REVIEW:		
<input type="checkbox"/> General Counsel:Date:		
<input type="checkbox"/> AGO:Date:		
Comments:		
<input type="checkbox"/> DEPARTMENT DIRECTOR APPROVAL:Date:		
Comments:		
<input type="checkbox"/> NOTARIZATION NEEDED		
		INITIALS/DATE